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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

1 GARY HOFMANN,  
2 Plaintiff,  
3  
4 v.  
5 FIFTH GENERATION, INC., a  
6 Texas corporation; and Does 1  
7 through 100, inclusive,  
8  
9 Defendants.

10 Case No.: 14-CV2569-JM-JLB  
11 Related Case No: 14-CV-02990- JM-JLB

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**JOINT MOTION FOR ENTRY OF  
STIPULATED PROTECTIVE ORDER**

29 Action filed: Sept. 30, 2014  
30 Removed: October 28, 2014

31 Trial date: October 31, 2016

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AND RELATED CASE

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1 Pursuant to Federal Rule of Civil Procedure 26(c), the parties have agreed on  
2 the form of a stipulated protective order and jointly move for its entry to govern the  
3 exchange of confidential information in this action. The parties respectfully request  
4 that the Court grant this Joint Motion and enter the proposed Stipulated Protective  
5 Order attached as Exhibit 1 and e-mailed to the chambers of Honorable Magistrate  
6 Judge Jill L. Burkhardt (efile\_Burkhardt@casd.uscourts.gov) pursuant to § 2 (h) of  
7 this Court's Electronic Case Filing Administrative Policies and Procedures Manual.

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10 DATED: August 10, 2015

Respectfully submitted,

11 COOLEY LLP

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/s/ Michelle C. Doolin

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DATED: August 10, 2015

DEL MAR LAW GROUP, LLP

/s/ John H. Donboli

John H. Donboli

Attorneys for Plaintiff

GARY HOFMANN and all other  
similarly situated

The undersigned hereby certifies that John H. Donboli, who has joined in the filing of this document, has approved of the content of this document and given me consent to file this document with his electronic signature.

/s/Michelle C. Doolin  
Attorneys for Defendant  
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# Exhibit 1

Pursuant to the request of  
Quality Control Clerk's Office  
Exhibit 1 has been emailed to  
Hon. Jill L. Burkhardt